

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL NO.: 09-055**

v. * **SECTION: "C"**

EDDIE MATTHEWS, III *

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, EDDIE MATTHEWS, III. The defendant has agreed to plead guilty to Count I of the Indictment charging him with Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 371.

In or around September 2007, MATTHEWS recruited Arielle Anderson a/k/a Tomorrow M. Newson, Danyale Barnett, a/k/a Rockell Gregory; Everny Gordon and Gilda Davis to make money by cashing altered checks in New Orleans, Louisiana and elsewhere.

A co defendant would testify that MATTHEWS used a paint thinner like substance which was purchased at a Walmart retail outlet to wash and alter the checks. Another co-defendant would

testify that the checks that were altered by MATTHEWS had been stolen from residential mailboxes by MATTHEWS or persons known by MATTHEWS.

In or around September 2007, MATTHEWS drove Anderson, Barnett, Gordon and Davis to various banks located in the Eastern District of Louisiana to cash checks that MATTHEWS had altered by making the checks payable to either Anderson, Barnett, Gordon or Davis. A co defendant would testify that she observed MATTHEWS writing their names on the checks while sitting inside the car, prior to presenting the checks at various banks. MATTHEWS altered each check so as to increase the amount of the check and forged the account holder's signature. For the checks cashed by Anderson, Gordon and Barnett, MATTHEWS wrote "care staff" or "mother's care staff" or "home health care" in the memo section of the checks. MATTHEWS asked Anderson, Gordon and Barnett to wear medical scrubs as clothing when they went to various banks to cash the altered checks so as to appear they were employed as home health care workers. In the memo section of the altered checks cashed by Davis, Matthews wrote "Catering Mothers 75 B-Day" and "Catering Mikes B-Day".

After cashing the checks, Anderson, Barnett, Gordon and Davis provided Matthews with the money illegally received from the banks, which totaled approximately \$22,518.00. Thereafter, MATTHEWS provided Anderson, Barnett, Gordon and Davis with a portion of the illegal proceeds.

On or about February 12, 2008 MATTHEWS recruited Shondra Irving from Houston, Texas to the Eastern District of Louisiana to cash stolen checks that had been altered by MATTHEWS. MATTHEWS told Irving to bring her birth certificate, social security card and nursing scrubs with her to Baton Rouge, Louisiana. Irving met MATTHEWS and Barnett at a bus station in Baton Rouge, Louisiana and drove Irving to New Orleans, Louisiana where Irving obtained a Louisiana

Identification card from the Louisiana Department of Motor Vehicles. MATTHEWS provided Irving with a stolen check which he altered to make payable to Irving and he increased the amount of the check from \$25.00 to \$985.00. In the memo section of the check MATTHEWS wrote “mothers care staff”. MATTHEWS then drove Irving to Regions Bank in Kenner, Louisiana where Irving cashed the stolen check. Regions Bank is a bank whose deposits are insured by the Federal Deposit Insurance Corporation as provided by Title 18 United States Code, Section 20. Irving provide \$985.00 which was illegally received from Regions Bank to MATTHEWS. MATTHEWS then provided a portion of the illegal proceeds to Irving.

Both the Government and the defendant, EDDIE MATTHEWS III, do hereby stipulate and agree the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty; that the total loss amount is approximately \$23,503.00 and that the government would have proven these facts beyond a reasonable doubt at trial.

JULIA K. EVANS (D.C. BAR # 435461) (DATE)
ASSISTANT UNITED STATES ATTORNEY

DEFENDANT EDDIE MATTHEWS III (DATE)

ROBERT JENKINS, ESQUIRE (DATE)
COUNSEL FOR EDDIE MATTHEWS III
LA. BAR ROLL NO. _____